

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

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JANE LEE PETERSON and  
RICHARD J. PETERSON,  
Plaintiffs,

vs.

CHURCH OF SCIENTOLOGY OF  
CALIFORNIA, et al.,  
Defendants.

**ORIGINAL**

Civil No. 81-3259-CBM

CAROL A. GARRITY and  
PAUL GARRITY,  
Plaintiffs,

vs.

CHURCH OF SCIENTOLOGY OF  
CALIFORNIA, et al.,  
Defendants.

Civil No. 81-3260-CBM

THOMAS JEFFERSON,  
Plaintiff,

vs.

CHURCH OF SCIENTOLOGY OF  
CALIFORNIA, et al.,  
Defendants.

Civil No. 81-3261-CBM

DANA LOCKWOOD,  
Plaintiff,

vs.

CHURCH OF SCIENTOLOGY OF  
CALIFORNIA, et al.,  
Defendants.

Civil No. 81-4109-CBM

CHURCH OF SCIENTOLOGY OF  
CALIFORNIA,  
Counterclaimant  
Plaintiff,

vs.

MICHAEL FLYNN, THOMAS HOFFMAN,  
THOMAS GREEN, KEVIN FLYNN,  
Counterclaimant  
Defendants.

DEPOSITION OF RONALD DE WOLF

May 26, 1983

Carson City, Nevada

REPORTED BY:

MARY E. BELL, CSR NO. 98

**CAPITOL REPORTERS**

OFFICIAL AND GENERAL COURT REPORTERS

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EXHIBIT E

1           A.    Well, the FBI came by the house, I think, what  
2 was it now, in I believe it was December, last December  
3 relating to my petition.

4           Q.    But they were just asking you questions about  
5 the allegations in the petition?

6           A.    Of course the FBI, they don't answer questions,  
7 they ask a lot of them. But it had to do with, I believe,  
8 some of the checks and bank accounts that were listed in  
9 the petition and I think what he had was a newspaper  
10 article that quoted part of the petition of some sort  
11 and I could only give him what was in the petition.

12          Q.    That would be the \$2 million check off of the  
13 Bank of New England or the Bank -- that check?

14          A.    Yeah. I believe it was mentioned a million and  
15 a half dollar check, a half-million dollar check, I'm  
16 not sure, but it came to \$2 million.

17          Q.    That information, you had no personal knowledge  
18 of those checks?

19          A.    Correct.

20          Q.    And that came into the petition through your  
21 attorney, I presume?

22          A.    Yes.

23          Q.    That would be Michael Flynn or Wilkie Cheong?

24          A.    I don't recall. Either one, probably Mr. Flynn.

25          Q.    And you have no idea how you learned that  
26 information about the checks?



1 A. No.

2 Q. You didn't give him that information?

3 A. No.

4 Q. Do you remember or know of any scientologists  
5 or ex-scientologists that you spoke to that had any  
6 information regarding those checks?

7 A. I don't believe so, no.

8 Q. And also there was I believe some allegations  
9 regarding gemstones. Was that likewise just allegations?

10 A. That was I believe from Mr. Flynn. The FBI  
11 didn't ask me about the gemstones.

12 Q. They were mainly interested in the check  
13 incident?

14 A. Yeah.

15 Q. Did they to your knowledge address themselves  
16 to any other part of the declaration or the petition,  
17 I should call it?

18 A. No. They asked me if I knew anything about  
19 Indian foods, which I didn't and something to do with the  
20 United Arab Immigrant and I didn't know anything about that  
21 either.

22 Q. Aquil Abdul Amiar?

23 A. Yeah, that's the fellow they asked about.

24 Q. According to the petition, it was a \$2 million  
25 check.

26 A. Oh, it was? Okay. So what I did, I said, "Well,

1 here's all the information I have," and I just gave him  
2 a copy of the petition.

3 Q. On the T.V. show you mentioned that there was  
4 some manipulation of your father's estate where  
5 investments were made in a Mafia organization or controlled  
6 organization called Innercap. I didn't notice that in the  
7 declaration.

8 A. I don't believe it's there. I haven't read the  
9 declaration for some time, but I don't believe it's  
10 there.

11 Q. This is new information?

12 A. Well, when we were in T.V. shows, I think it  
13 was in Washington, D.C., we were sitting in the green  
14 room and Mike Flynn and I and Van or Robert Young and  
15 Harvey Silverburg, Silverblade, something like that, we  
16 were sitting around talking about it and I was talking  
17 about it and Mike started telling him, "Well, do you  
18 know about this, this, and this," and he mentioned I believe  
19 the Attorney General, State of Arizona, and Innercap or  
20 Intericap, something like that.

21 Q. And Michael Flynn mentioned that they were  
22 controlled by the Mafia?

23 A. Well, he said something about indictments coming  
24 down on organized crime figures, but he didn't mention  
25 anything about anybody specific.

26 Q. But you have no knowledge about Hubbard's estate



1 funds being invested in this organization?

2 A. No.

3 Q. There have been two affidavits basically filed  
4 in this case, one being an earlier one and then after the  
5 probate matter was filed, the probate affidavit was also  
6 filed which contained a tremendous amount of additional  
7 data that had never before been put in affidavit form and  
8 filed with the court. Is there any reason why all this  
9 information wasn't brought forward earlier?

10 A. I don't know.

11 Q. You had it supposedly. I mean, it's allegations  
12 you're making about events that took place in the early  
13 '50's, but yet we never hear about this basically until  
14 the Chic article which came out in April of '82. Is there  
15 any reason --

16 A. No, the Chic article came out earlier.

17 Q. February of '82. Is there any reason why all  
18 this information was never mentioned by you in any  
19 writings, affidavits, letters, never mentioned in your  
20 testimony but only came forward in 1982?

21 A. I don't understand all of what you just said.

22 Q. You supposedly have known a lot of this  
23 information about drug use, sexual acts, occult practices,  
24 black magic, since the '50's?

25 A. Yes.

26 Q. Yet you have never mentioned them, never testified



1 and sit down and talk with him.

2 Q. Have you had an opportunity to review the evidence  
3 presented in the probate case, the handwriting analysis,  
4 the fingerprint analysis, the ink analysis?

5 A. Some of it, yes. But that's all furnished by  
6 the other side and I haven't yet seen our response which  
7 should be in by June 10th.

8 Q. You know that your side or you have always  
9 through your attorney the opportunity to take our materials  
10 and have your own analysis done; is that correct?

11 A. Correct. I think that is being done now or  
12 has been done.

13 Q. If the analysis of your attorneys through your  
14 experts state that the handwriting is L. R. Hubbard's, that  
15 the ink on the paper was placed in 1983, the thumbprint  
16 put over the ink is that of L. R. Hubbard, Sr., would you  
17 then believe that he is alive?

18 A. Well, I may not, but I would go with whatever  
19 the court decision said. That would be up to the court.  
20 I mean, you're putting it at the level of what our experts  
21 would say. I would forego with the court decision, whether  
22 he's missing or not, and that's the exact extent of the  
23 petition as it stands now.

24 Q. A point I've never been really clear on. Have  
25 you actually seen him since 1959?

26 A. No.



1 A. Because they kept asking.

2 Q. That's the only reason?

3 A. If they quit asking I would probably quit. The  
4 point is simply I still feel I've been trying -- various  
5 individuals within and around the organization, whether  
6 they are attached to it or not, try to keep me kind of  
7 quiet and I don't care to keep quiet.

8 Q. But no one is putting any pressure or thoughts  
9 upon you to keep you quiet?

10 A. And I also feel -- not since the petition, no.

11 Q. You have complete freedom of speech?

12 A. I do now and one of the reasons I'm willing to go  
13 with the press is it's to my own feeling a good,  
14 predominant protection. It's kind of hard to do funny  
15 little things with all kinds of press and media over your  
16 picture.

17 Q. Is that the reason you're doing it?

18 A. That's one reason.

19 Q. Does your attorney know you're meeting the press  
20 on all these occasions and discussing the case on  
21 national television?

22 A. I think so.

23 Q. Isn't it a fact that Michael Flynn set up the  
24 20/20 interview with Gordon Freedman?

25 A. I don't know who set it up.

26 Q. Haven't you met with members of the press at

1 Michael Flynn's office?

2 A. I believe so, yes, back in Boston a few weeks  
3 ago.

4 Q. Basically it's Michael Flynn who drafts these  
5 petitions that go into the court and then all of a sudden  
6 go straight to the media?

7 A. I don't know about going straight to the media.  
8 I do know that he is in the main prepared and/or his office  
9 or what have you has prepared quite a bit of it.

10 Q. And a lot of it is just his own information and  
11 not yours?

12 A. Information concerning my father's life and my  
13 life, yes, but I think it's put in a more coherent form.

14 Q. So anything after '59 is just stuff that you have  
15 no direct knowledge of and it's just stuff that you learned  
16 through Michael Flynn and third party sources?

17 A. Correct. My personal knowledge ends November  
18 23rd, 1959, insofar as my scientology, within the  
19 organization goes.

20 Q. You talk about your father's extreme paranoid  
21 condition between '75 and '78 to conceal his location?

22 A. That's information and belief.

23 Q. But you just testified that you have not seen  
24 him since 1959?

25 A. That's personal knowledge, correct.

26 Q. So it doesn't seem to be an extreme paranoid



1 A. Well, I don't know who did what and where in  
2 actual facts.

3 Q. But it is a fact that if you want a question  
4 answered about what's happening in the case or who's doing  
5 what, Michael Flynn is the man to talk to before Wilkie  
6 Cheong?

7 A. Depending upon what it's about.

8 Q. I mean declarations, motions, strategy, the  
9 important decisions in the case, not who is going to appear  
10 where.

11 A. Again, I just have to say my attorneys.

12 Q. Which includes Wilkie Cheong and Michael Flynn?

13 A. Correct.

14 Q. Did you catch that?

15 A. Yes.

16 Q. You sort of gave it to the reporter.

17 Let's adjourn this thing. I'm after 4:00. I'm  
18 treading on borrowed time.

19 -oOo-

20  
21  
22 RONALD DE WOLF

23 SUBSCRIBED AND SWORN TO BEFORE ME

24 this \_\_\_\_\_ day of \_\_\_\_\_, 1983.

25  
26 \_\_\_\_\_  
NOTARY PUBLIC



1 STATE OF NEVADA )  
2 ) ss.  
3 DOUGLAS COUNTY )

4 I, MARY E. BELL, a Notary Public in and for the  
5 County of Douglas, State of Nevada, do hereby certify:

6 That on Thursday, the 26th day of May, 1983, at  
7 9:08 a.m. of said day, at 108 West Telegraph Street,  
8 Carson City, Nevada, personally appeared RONALD DE WOLF,  
9 who was duly sworn by me to testify the truth, the whole  
10 truth and nothing but the truth, and thereupon was deposed  
11 in the matter entitled herein;

12 That said deposition was taken in verbatim  
13 stenotype notes by me, a Certified Shorthand Reporter, and  
14 thereafter transcribed into typewriting as herein appears;

15 That the foregoing transcript, consisting of pages  
16 1 through 192, inclusive, is a full, true and correct  
17 transcription of my stenotype notes of said deposition.

18 DATED at Carson City, Nevada, this 9<sup>th</sup> day of  
19 June, 1983.

20  
21 Mary E. Bell  
22 MARY E. BELL, CSR NO. 98

